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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

|                           |   |                       |
|---------------------------|---|-----------------------|
| UNITED STATES OF AMERICA, | ) |                       |
| Plaintiff,                | ) |                       |
|                           | ) |                       |
| vs.                       | ) |                       |
|                           | ) |                       |
| RONALD H. FRAZE           | ) |                       |
| Defendants.               | ) |                       |
| _____                     | ) | No. A05-0089 CR (RRB) |

UNOPPOSED MOTION TO EXTEND PRETRIAL DEADLINES

COMES NOW Defendant, Ronald H. Frazee (D-2), through counsel, Ronald A. Offret of AGLIETTI, OFFRET & WOOFER and requests that the pretrial deadlines previously set by Magistrate Judge Terrence W. Hall on November 23, 2005 (Docket #27) be extended for the reasons that a large amount of pre-indictment discovery needs to be reviewed. This material was generated through a civil arbitration proceeding, a lawsuit in State Court and a bankruptcy proceeding.

The parties, including Defendants and U.S. Attorney's Office, have not had an opportunity to complete a review of that discovery.

Further, the parties have discussed possible resolution of this case without the need for pretrial motions.

Accordingly, it would seem appropriate that the deadlines for pretrial motion dates be extended.

The parties request that:

- 1) discovery close and exchange of discovery be extended to February 28, 2006;
- 2) pretrial motions due by March 20, 2006;
- 3) oppositions to pretrial motions due March 31, 2006.

Judge Beistline has re-set the trial date for this matter to commence May 8, 2006. The above pretrial deadlines can be met and still leave time for resolution of the matter prior to trial.

The United States Attorney's Office, through Karen Loeffler, does not oppose this motion and joins in it and Defendant Lervaag, through his attorney, Sue Ellen Tatter, has agreed to the extension of these deadlines as well.

DATED this 31<sup>st</sup> day of January, 2006, at Anchorage, Alaska.

AGLIETTI, OFFRET & WOOFER  
Attorneys for Defendant Ronald H. Frazee

/s/  
Ronald A. Offret #7410096